
 **Program Participant Eligibility:
Understanding Definitions and
Documentation Requirements for
the ESG Program**

Date

 **Welcome and Introductions**

Workshop Facilitators

- **Facilitator 1:** Name, Organization
- **Facilitator 2:** Name, Organization

Participant Introductions

2


 

 **Materials and Logistics**

- Training Materials
- Restrooms, etc.
- Cell phones off – please
- Lunch and Breaks



3


 

 **AGENDA**

- ESG Program: Eligible Components
- Definition of Homeless
- Definition of At Risk of Homelessness
- Policy and Procedures
- Homeless and At Risk Documentation
- Income Documentation

4



 

 **Overall Objectives**

Participants will be able to:

- Describe the criteria under the homeless and at risk of homeless definition and how it applies to ESG programs
- Understand the requirement to develop local policies and procedures for recordkeeping
- Incorporate and use HUD's preferred order for documentation in policies and procedures
- Adopt and use documentation standards


5



 **ESG Program Components**


6

 **The New ESG Rule**

- **Interim Rule on Emergency Solutions Grant Program**
 - Effective January 4, 2012
 - Renamed the program
 - Added RRH as an eligible activity
 - Changed funding limits
 - Defined at-risk of homeless for ESG programs
- **Final Rule on Definition of Homeless**
 - Effective January 4, 2012
 - Clarified who is homeless for HUD programs



 


 **Eligible ESG Program Components**

- Street Outreach
- Emergency Shelter
- Homelessness Prevention
- Rapid Re-Housing Assistance

Other eligible activities:



- HMIS
- Administrative Activities


 

 **Definitions of Homeless for ESG Projects**

- **Homeless** Definition applies to:
 - Street Outreach (Categories 1* and 4* only)
 - Emergency Shelters (Categories 1, 2, 3, 4)**
 - Rapid Re-housing (Categories 1 and 4*** only)
 - Homelessness Prevention (Categories 2, 3, 4)
- **At Risk** of Homeless applies only to:
 - Homelessness Prevention

*** if unsheltered homeless at the time**
**** Shelter Program are expected to divert to extent practical**
***** Category 4; if also literally homeless**



 **Category 1: Literally Homeless**


1.1 Unsheltered: Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation.

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Street, cars
- Abandoned buildings
- Train and bus stations
- Camp Grounds

No change. These individuals and families were previously eligible under the "legacy ESG" program.


 



 **Category 1: Literally Homeless**


1.2 In Shelter: Living in a supervised shelter designated to provide temporary living arrangements, including:

An individual or family who lacks a fixed, regular, and adequate nighttime residence:

- Congregate shelters
- Transitional housing
- Hotels and motels paid for by charitable organizations or federal/state/local government programs

 *Change: clarifies that hotels/motels that are paid for by an agency are included*


 



 **Category 1: Literally Homeless**


1.3 Exiting an institution (e.g., jail, hospital)

An individual who lacks a fixed, regular, and adequate nighttime residence, meaning:

- An institution where they resided for **90 days or less** AND
- Were residing in **emergency shelter or place not meant for human habitation** immediately before entering institution.


 *Change: residency requirement increased from 30 to 90 days*



 

 **Category 2: Imminently Homeless**

Individuals/families who:

- will imminently lose their primary nighttime residence within 14 days AND
- have no subsequent residence identified AND
- lack the resources or support networks needed to obtain other permanent housing.

 *Change: previously was a 7-day requirement*


  16

 **Category 2: Imminently Homeless**

Primary Nighttime Residence:



1. Housing they own
2. Housing they rent directly from a landlord
3. Housing they are sharing with others
4. Hotels or motel rooms not paid for by a publically or privately funded program


  17

 **Category 3: Other Federal Statutes**

Unaccompanied youth under 25 or families with children and youth who do not otherwise qualify as homeless, but who:

1. meet definition of homeless under another federal statute (see next slide); AND
2. have not had lease, ownership interest, or occupancy agreement in permanent housing at any time during last 60 days; AND
3. have experienced two or more moves during last 60 days; AND
4. is expected to continue in such status for an extended period of time due to a special need or 2 or more barriers to employment.



 


 **Category 3: Other Federal Statutes**

1. Meet homeless definition under one of the following other federal statutes:

- Runaway and Homeless Youth Act
- Head Start Act
- Violence Against Women Act of 1994; subtitle N
- Public Health Service Act; section 330
- Food and Nutrition Act of 2008
- Child Nutrition Act of 1966; section 17
- McKinney-Vento Act; subtitle B of title VII

19



 


 **Category 3: Other Federal Statutes**

2. No lease or ownership interest in the past 60 days.

3. Have experienced persistent instability (two or more moves during the past 60 days).

20



 **Category 3: Other Federal Statutes**


4. Can be expected to continue in such status for an extended period of time because of a special need or 2 or more employment barriers.

Special need defined as:

- chronic disabilities, OR
- chronic physical or mental health conditions, OR
- substance addiction, OR
- histories of domestic violence or childhood abuse (including neglect) OR
- presence of a child or youth with a disability

21



 


 **Category 3: Other Federal Statutes**

Barriers to Employment include:

- Lack of high school degree or GED,
- Illiteracy or Low English proficiency
- History of incarceration
- History of unstable employment

22



 


 **Category 4: Domestic Violence**

Individuals/families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, who:

- have no identified subsequent residence; and
- lack the resources and support networks needed to obtain other permanent housing.



23


 



 **Overview of Homeless Definition**


Homeless definition has 4 categories:

- Category 1: Literally homeless individuals/families
- Category 2: Individuals/families who will imminently lose their primary nighttime residence
- Category 3: Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statutes
- Category 4: Individuals/families fleeing or attempting to flee domestic violence

 **Case Scenarios**



 


 **Eduardo**

25-year old Eduardo came back from Iraq 18 months ago and says he has “trouble with his mind ever since.” He lost his last job and couldn’t pay the rent. He crashed with various buddies until the last one kicked him out.

Eduardo was spotted sleeping outside by his former high school teacher, Pete. Pete said Eduardo could stay at his place but Eduardo is always high, so Pete finally told him he had to find somewhere else to stay as soon as possible (within a week).

26



 


 **Quiz: Eduardo**

What is Eduardo’s Homeless Status?

- a) Category 1: Literally Homeless
- b) Category 2: Imminent Risk of Homelessness
- c) Either; he could qualify as Category 1 or Category 2
- d) More information is needed to decide

27



 


 **Quiz: Eduardo**

Based on Eduardo's Homeless Status, what ESG program component could he access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention

28



 


 **Angela and her family**

Angela, a 16-year old high school student, is frequently absent. Her school social worker found out the family lost their housing 3 months ago when her mother got sick and lost her job. Since then, the family has separated and everyone is doubling up with a different friend or relative, changing living arrangements as needed, several times within the last 3 months.

The social worker has verified that Angela and her family meet the federal definition of homeless under federal Education statutes.

29



 


 **Quiz: Angela and her family**

What is Angela and her family's Homeless Status?

- a) Category 2: Imminent Risk of Homelessness
- b) Category 3: Homeless Under Other Federal statutes
- c) Category 1: Literally Homeless
- d) More information is needed to decide

30



 


 **Quiz: Angela and her family**

What additional information is needed?
(chose all that apply)

- a) Whether they have had a lease, ownership or occupancy agreement in the past 60 days.
- b) How many times they have moved in the past 60 days.
- c) Whether anyone in the family has a special need or whether the mom has at least two employment barriers.

31



 


 **Quiz: Angela and her family**

Based on the most likely Homeless Status, what ESG program component could they access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention

32



 


 **Walter**

Walter, 59, has been homeless for 8 years. He is a frequent user of detox, hospital emergency departments and jail. Lately he has been sleeping under a highway overpass but a police officer found him there and has given him 24 hours to find an alternative place to stay or be arrested.

Walter told the officer that because he's a drunk he has been denied SSI, so he has no money for rent.

33



 


 **Quiz: Walter**

What is Walter's Homeless Status?

- a) Category 1: Literally Homeless
- b) Category 2: Imminent Risk of Homelessness
- c) Both: He could qualify as either
- d) More information is needed to decide

34



 


 **Quiz: Walter**

Based on Walter's Homeless Status, what ESG program component could he access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention

35



 


 **Traci**

Traci (25) has been living with her boyfriend for the past two years. He has always been controlling, but lately he is accusing her of sleeping around and has become physically abusive. One night he threatened to kill her. She believed him and fled, with nothing but the clothes she was wearing.

Traci has presented to a homeless shelter for women.

36



 


 **Quiz: Traci**

What is Traci's Homeless Status?

- a) Category 1: Literally Homeless
- b) Category 4: Fleeing/Attempting to Flee Domestic Violence
- c) Both
- d) More information is needed to determine

37



 


 **Quiz: Traci**

Based on Traci's Homeless Status, what ESG program component could she access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention



38


 

 **Quiz: Traci**

Definition of At Risk of Homelessness

39



 


 **Overview of At Risk of Homelessness**

At-Risk of Homelessness definition has 3 categories applicable to:

- 1) Individuals and Families
- 2) Unaccompanied Children and Youth deemed homeless under other federal statutes
- 3) Children and Youth (and their families) who are homeless under Section 725(2) of McKinney Vento Homeless Assistance Act

40



 


 **At Risk Category 1 Criteria**

Individuals/families who:

- Have annual incomes below 30% AMI; AND
- Do not have sufficient resources or support networks immediately available to prevent literal homelessness; AND
- Meet at least one of 7 risk factors

41



 


 **At Risk Category 1 Criteria (cont.)**

7 Risk Factors (must meet at least one):

- 1) Moved two or more times due to economic reasons in 60 days prior to application for assistance.
- 2) Living in home of another due to economic hardship.
- 3) Obtained written notification that losing housing within 21 days after application date.

42



 


 **At Risk Category 1 Criteria (cont.)**

7 Risk Factors, continued (must meet at least one):

- 4) Lives in hotel/motel not paid for by charitable organizations or Fed/state/local government programs.
- 5) Lives in severely overcrowded unit as defined by the US Census Bureau:
 - SRO or efficiency apartment with more than 2 persons.
 - In larger housing units, more than one and a half persons per room.

43



 


 **At Risk Category 1 Criteria (cont.)**

7 Risk Factors, continued (must meet at least one):

- 6) Exiting publicly funded institution or system of care.
- 7) Lives in housing associated with instability and increased risk of homelessness, per recipient Con Plan.

44



 


 **Summary: At Risk Category 1**

Individuals/families who:

- 1) Have annual incomes below 30% AMI; AND
- 2) Do not have sufficient resources or support networks immediately available to prevent literal homelessness; AND
- 3) Meet at least one of 7 conditions.

45



 


 **At Risk Category 2 Criteria**

Unaccompanied children/youth who qualify under other federal statutes

- Does not include children/youth who qualify under the homeless definition
- Does not include parents or guardians
- ESG Regulations include the list of applicable other federal statutes

46



 


 **List of Other Federal Statutes**

Other Federal Statutes for Category 2:

- Runaway and Homeless Youth Act
- Head Start Act
- Violence Against Women Act of 1994
- Public Health Service Act
- Food and Nutrition Act of 2008
- Child Nutrition Act of 1966

47



 

 **At Risk Category 3 Criteria**

Children/youth who qualify under Section 725(2) of the McKinney-Vento Act (Education for Homeless Children and Youth program)

- And the parents or guardians of that child/youth if living with him/her

48

Differences

<p>Homeless Category 3</p> <ul style="list-style-type: none"> All 7 other Federal Statutes Includes families/guardians if living with youth/children 3 additional conditions: <ul style="list-style-type: none"> No lease in past 60 days Two or more moves in past 60 days Disabling conditions or barriers to employment 	<p>At Risk Category 2</p> <ul style="list-style-type: none"> Only 6 of the 7 other Federal Statutes Limited to children and youth <p>At Risk Category 3</p> <ul style="list-style-type: none"> Only 725(2) of the McKinney-Vento Act Includes families/guardians if living with youth/children
--	--

49


Case Scenarios

Janelle and her 2 Children

Janelle (21) and her two children (3, 1) rely on TANF (15% AMI). She was spending 70% of their income on rent when, two months ago, the landlord raised her rent. She could not pay the increase so the family moved into her brother's place.

Now Johnny's landlord is saying Johnny will be evicted if he does not make Janelle leave within 15 days.



51


 **Quiz: Janelle and her 2 Children**

What is Janelle's At-Risk of Homelessness Category?

- a) Category 1
- b) Category 2
- c) Category 3

52



 


 **Quiz: Janelle and her 2 Children**

What is her risk factor?

- a) Risk 1: Persistent housing instability
- b) Risk 2: Living in the home of another due to economic hardship
- c) Risk 3: Housing Loss within 21 days

53



 


 **Quiz: Janelle and her 2 Children**

Based on Janelle's At-Risk Status, what ESG program component could she access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention

54


 **Josh and Tom**


Josh (14) and Tom (13) have separated from their mother and youngest brother, Michael (3). Their mother, a single parent, lost her job and their home was foreclosed 3 months ago.

She was able to secure lodging for Michael and herself with friends, but not the teenage boys. They are staying with their friends for as long as they can.

Their school social worker has determined that Josh and Tom meet the federal definition of homeless under McKinney-Vento.

55





 **Quiz: Josh and Tom**

What is the appropriate At-Risk category for this family?

- a) Category 1
- b) Category 2
- c) Category 3

56





 **Quiz: Josh and Tom**

Based on their At-Risk Status, what ESG program component could the family access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention


57




 **Darryl**

Darryl suffered serious injuries following an accident 3 months ago. Since then he has no income to pay the rent and has lost his apartment. Darryl moved to Detroit, into his only brother Mark's efficiency condo. He sleeps in a sleeping bag on the floor; Mark and his wife sleep in the bed.

58





 **Quiz: Darryl**

What is Darryl's At-Risk of Homelessness category?

- a) Category 1
- b) Category 2
- c) Category 3

59





 **Quiz: Darryl**

What is his risk factor?

- a) Risk 3: Housing Loss within 21 Days
- b) Risk 2: Living in the home of another due to economic hardship
- c) Risk 5: Living in severely over-crowded housing as defined by the US Census Bureau

60






 **Quiz: Darryl**

Based on Darryl's At-Risk Status, what ESG program component could he access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention

61



 


 **Melany**

Melany (16) ran away from home to be with her boyfriend, but he left her as soon as he found out she was pregnant. Melany is living with her best friend's family for now, but that family wants her to leave before the baby is born (in about four months).

The high school social worker has determined that Melany meets the definition of homeless under the Runaway and Homeless Youth Act.

62



 


 **Quiz: Melany**

What is Melany's At-Risk of Homelessness category?

- a) Category 1
- b) Category 2
- c) Category 3

63



 


 **Quiz: Melany**

Based on Melany's At-Risk Status, what ESG program component could she access?

- a) Street Outreach
- b) Emergency Shelter
- c) Rapid Re-Housing
- d) Homelessness Prevention



64


 



Standards for Documentation



65


 

 **Written Policies & Procedures**

Recipients must develop and use local policies and procedures for recordkeeping:



- Create systemic approach for intake staff to screen potential applicants
- Establish protocols for collecting and maintaining required back up documentation
- Ensure records are maintained for ALL persons seeking assistance (including those persons that are determined to be ineligible)


 

 **Tips for Policies and Procedures**

- Adopt checklists that reflect required order
- Have staff check for existing documentation (e.g., HMIS records or discharge paperwork)
- Create forms for tracking & documenting due diligence
- Develop standardized forms that can be used by the entire CoC

67






 **Overall Goal**

Documentation should be:

- Specific to the individual/family
- Explicit regarding criteria that established eligibility
- Relevant in terms of time

68






 **Order for Documentation**

HUD's required order:

- 1) Third Party
 - Source
 - Written
 - Oral
- 2) Intake Observations
- 3) Self-Certification

69






 **Third Party – Source**

Notices/Statements

- Official communication on letterhead or statement template or organization email
- Signed and dated (as appropriate)
- Additional standards depend on purpose
- Examples:
 - Notices: eviction, job termination, etc.
 - Statements: Wage (paysstub), Social Security, Bank Checking/Saving, etc.

70






 **Third Party – Written**

Written Letters/Referrals

- Official communication (agency stationary or program template) or organization email
- Signed and dated by appropriate representative of third party
- Additional standards depend on purpose:
 - Housing history (eviction related details, living situation & length of stay details)
 - Economic hardship (letter citing inability to work or recent termination, etc.)

71

 **Third Party – Oral**


Recorded Oral Statements

- By intake staff
- Of 3rd party providing verification
- Signed and dated by intake staff as true and complete
- Example: Phone call with previous landlord, notes from call recorded by intake staff

**Recommend standardized form for program*

72






 **Intake Observations**


Recorded intake staff observations

- Intake staff notes on their observations and assessments
- Signed and dated by intake staff as true and complete

**Recommend standardized form for program*

73



 


 **Self-Certification**

Individual/Head of Household Statement

- Written statements certified (signed and dated) as true and complete
 - Regulations specify when oral statements can be used
- If self-certification used, must be verified
 - Confirmation that certification was verified by intake staff OR
 - Documented due diligence

74



 **Due Diligence**


Documentation of Intake Staff Efforts

- Attempts to obtain priority documentation (e.g. phone logs, emails, copies of certified letters, etc.) AND
- Outcomes (including obstacles); OR
- Circumstances that make it inappropriate to pursue priority order documentation.
- Must be signed and dated by intake staff as true and complete



**Recommend standardized form for program*


75



 **Acceptable Documentation of Homeless, At Risk and Income**


76

 **Homelessness Status: Examples of Acceptable Documentation**

77

 **Category 1: Literally Homeless**



If Unsheltered Homeless


Program Component: Street Outreach, Shelter

- Third party documentation not required

Program Component: Rapid Re-housing



- HUD's preferred order applies
- Third Party – Written examples:
 - HMIS street outreach service record
 - Homeless Certification/Referral from local law enforcement or emergency medical services
- Not required to document due diligence


 

 **Category 1: Literally Homeless**

If In Shelter



- HUD's preferred order applies
- Third Party –Written examples
 - HMIS shelter stay record
 - Homeless Certification/Written Referral from shelter


 

 **Category 1: Literally Homeless**

If Exiting an Institution where resided up to 90 days



- Condition #1: Prior to entering institution, person was unsheltered or living in emergency shelter
- Condition #2: Length of stay in institution is 90 days or less
 - Third party written
 - Third party oral
 - Self Certification AND due diligence


 

 **Category 2: Imminent Risk of Homelessness**

3 Conditions:

- 1) Housing Loss within 14 days
 - Documentation requirements vary by condition and type of housing
 - tenant or owner,
 - self-paying at a hotel/motel
 - other housing situations
- 2) No subsequent residence
- 3) Lack of resources and support networks to obtain other housing



 **Category 2: Imminent Risk Housing Loss within 14 Days**


Condition 1:

Housing Type #1: If tenant/homeowner

Appropriate documentation:

- Third Party –Written:
 - Court order to leave OR
 - Other equivalent notice under State law, which may include:
 - Notice to Terminate OR
 - Notice to Quit



 **Category 2: Imminent Risk Housing Loss within 14 Days**


Housing Type #2: Self-paying at hotel/motel

- Self-Certification, supported by other documentation when practical

Housing Type #3: Other housing situations (i.e., doubled-up)

- Self-certification, supported by:
 - Third Party Verification OR
 - Due Diligence

 **Category 2: Imminent Risk Conditions 2 and 3**



Condition #2: No subsequent residence


- Self-Certification, supported by other documentation when practical

Condition # 3: Lack of resources & support networks

- Self-Certification, supported by other documentation when practical



*Recommend standardized form for program


 

 **Category 3: Homeless Under Other Federal Statute**

Four conditions to be met:



- 1) Homeless under other Federal Statute
- 2) No lease or ownership interest in 60 days
- 3) Persistent instability
- 4) Disability or barriers to employment


 

 **Category 3: Homeless Under Other Federal Statute**

Condition #1: Certified Homeless by applicable federal program

- Third Party – Written only
 - Must be from agency administering Federal program
 - If certification does not specify age of the unaccompanied youth or child in the household, then documentation of age must be obtained by the recipient/subrecipient



 


 **Category 3: Homeless Under Other Federal Statute**

Condition 2: No lease, ownership interest, occupancy agreement in permanent housing during preceding 60 days

- Third Party – Written
 - Homeless Certification
 - Written referral from provider
- Third Party – Oral
- Intake observations
- Self-Certification

87



 


 **Category 3:
Homeless Under Other Federal Statute**

**Condition 3: Persistent Instability
(2 or more moves during preceding 60 days)**

- Self-Certification, supported by:
 - Third Party –Written
 - Third Party –Oral
 - Intake Observations OR
 - Due Diligence if verification is unavailable
- Exception for move prompted by flight from DV

88



 **Category 3:
Homeless Under Other Federal Statute**


Condition 4: Expected to retain status for extended period due to special needs or 2 or more employment barriers

If special needs:

- Third Party – Written
 - Written diagnosis from professional licensed by state to diagnose and treat condition OR
 - Intake observation confirmed by written diagnosis from licensed professional within 45 days.

89



 **Category 3:
Homeless Under Other Federal Statute**


Condition 4 continued ...

If 2 or more employment barriers:

- Third Party – Written
 - Employment records;
 - Department of corrections records;
 - Literacy, English proficiency tests; or
 - Other reasonable documentation
- Third Party – Oral

90



 **Category 4:
Fleeing/Attempting to Flee DV**


3 Conditions:

- 1) Flight/Attempt to Flee DV
- 2) No subsequent residence
- 3) Lack of resource to obtain other housing

- Self-certification acceptable for all three
- Requirement for additional or greater documentation varies by type of agency determining homeless status

91



 


 **Category 4:
Fleeing/Attempting to Flee DV**

If documenting agency is a Victim Service Provider:

- Self-certification of all three conditions
 - Signed and dated by individual/head of household OR
 - Oral statement recorded by intake staff, signed and dated as true and complete by intake staff

92



 **Category 4:
Fleeing/Attempting to Flee DV**


If documenting agency is a Non-Victim Service Provider:



- Self-certification of condition 1 supported by:
 - **Third party written** referral source from whom assistance was sought for DV OR **intake worker observation**
 - Need only contain minimum amount of information necessary and
 - Confirm household is fleeing/attempting to flee DV
 - **Only gather supporting documentation if it poses no threat to safety of applicant**
- Self-certification of conditions 2 & 3: no subsequent residence, resources or support networks


*Recommend standardized form for program

93

 **Case Scenarios**



 


 **Eduardo**

Recall that Eduardo had been sleeping outside for over seven months. He came back from Iraq 18 months ago and said he has had "trouble with his mind ever since." He lost his last job for absenteeism and lost his apartment when he couldn't pay the rent. He crashed with various buddies until the last one kicked him out.

His former teacher, Pete, said Eduardo could stay at his place and sleep on the couch temporarily but Eduardo was high the whole time, so Pete told him he had to find somewhere else to stay as soon as possible (within a week). Eduardo is Homeless Category 2.



95


 

 **Quiz: Eduardo**

What documentation would be required for Eduardo to receive Emergency Shelter Services?


96


 

 **Quiz: Eduardo**

What documentation would be required for him to receive Homelessness Prevention assistance?

97





 **Angela and her family**

Recall that the school social worker found out the family lost their housing 3 months ago when her mother got sick and lost her job. Since then, Angela and her sister have been separated from their mom and everyone is doubling up with a different friend or relative, changing their living arrangements every two weeks.

The social worker has verified that Angela and her family meet the federal definition of homeless under federal Education statutes. Angela and her family are Homeless, Category 3.


98




 **Quiz: Angela and her family**

What documentation is necessary for Angela and her family to receive Emergency Shelter?


99




 **Quiz: Angela and her family**

What documentation would be necessary for the family to receive Homelessness Prevention?

100





 **Walter**

Recall that Walter, 59, has been homeless for 8 years. He is a frequent user of detox, hospital emergency departments and jail. Lately he has been sleeping under a highway overpass but a police officer found him there and has given him 24 hours to find an alternative place to stay or be arrested.

Walter is Homeless, Category 1.


101




 **Quiz: Walter**

What documentation would be required for Walter to obtain Street Outreach assistance or Emergency Shelter?

102





 **Traci**

Recall that Traci (25) has been living with her boyfriend for the past two years. One night he threatened to kill her. She believed him and fled, with nothing but the clothes she was wearing. Traci went straight to a homeless shelter for women and is asking for a place to stay.

Traci is Homeless Category 4.


103




 **Quiz: Traci**

If the homeless shelter is a victim services provider, what documentation is necessary for Traci to receive Emergency Shelter Services?


104



 **Quiz: Traci**


If the homeless shelter is not a victim services provide, what documentation is necessary?

105



 **At Risk of Homelessness Status:
Examples of Acceptable
Documentation**



 


 **At Risk Category 1:
Individuals & Families At Risk**

3 conditions:

- 1) Income below 30% AMI (*more later*)
- 2) Insufficient financial resources or support networks to prevent homelessness
- 3) Meets 1 of 7 risks specified in ESG Interim Regulations

107



 


 **At Risk Category 1:
Individuals & Families At Risk**

Condition 2: Lack of resources & support networks to prevent homelessness

- Self-Certification, supported by other documentation when practical.
- Examples include: termination notice, unemployment compensation statement, bank statement, health care/utility bill showing arrears.

108



 


 **At Risk Category 1:
Individuals & Families At Risk**

Condition 3: Meets 1 of 7 risks
Requirement for documenting the 7 risks

- Self-Certification AND
- Supporting Documentation, as appropriate
 - Third Party – Source, Written, or Oral
 - Intake Observation (in some cases) OR
 - Documentation of Due Diligence

109



 


 **At Risk Category 1:
Individuals & Families At Risk**

Risk 1: Persistent housing instability (2 or more moves within 60 days) due to economic reasons

- Housing history must demonstrate 2 or more moves within 60 days
 - Documentation source and type may include:
 - HMIS records
 - Referral from housing/service provider
 - Letter from tenant/owner
 - **Intake observation is likely not appropriate.**

110



 


 **At Risk Category 1:
Individuals & Families At Risk**

Risk 1: Persistent housing instability (2 or more moves within 60 days) due to economic reasons

- Economic reasons may include termination from employment, unexpected medical costs, inability to maintain housing including utilities, etc.
 - Documentation source and type may include:
 - Notice of termination
 - Health care bills indicating arrears
 - Utility bills indicating arrears
 - **Intake observation is likely not appropriate**


111


 

 **At Risk Category 1:
Individuals & Families At Risk**

Risk 2: Living in the home of another because of economic hardship


- Housing must be in the home of another (i.e., doubled up)
 - Letter from tenant/homeowner
 - Intake observation may be appropriate
- Economic hardship may include termination from employment, unexpected medical costs, inability to maintain housing including utilities, etc.


112 

 **At Risk Category 1:
Individuals & Families At Risk**

Risk 3: Written Notification of Housing loss within 21 days


- Written Notification to leave within 21 days
 - If tenant/homeowner: eviction notice, court order to leave within 21 days
 - If staying with another (doubled up): written notification to leave from tenant/homeowner


113 

 **At Risk Category 1:
Individuals & Families At Risk**

Risk 4: Living in a rented hotel or motel (not paid by charitable or government program)

- Housing must be in hotel/motel
 - Letter from hotel/motel manager
 - Intake observation
- Costs have not been covered by charitable organization or government program
 - Cancelled checks



114 


 **At Risk Category 1:
Individuals & Families At Risk**

Risk 5: Living in a severely over-crowded unit as defined by US Census Bureau

- Census Bureau Definition:
 - SRO or efficiency apt: more than 2 people
 - Larger housing: more than 1.5 people/room
- Must document # of rooms in unit and # of individuals living in unit
 - Lease
 - Unit details from Tax Assessor's Office
 - Intake observation

115



 


 **At Risk Category 1:
Individuals & Families At Risk**

Risk 6: Exiting publicly funded institution or system of care

- Documenting discharge from health care facility, mental health facility, foster care or other youth facility, or correction program
 - Discharge paperwork
 - Referral letter

116



 


 **At Risk Category 1:
Individuals & Families At Risk**

Risk 7: Living in housing associated with instability & an increased risk of homelessness as described in approved Consolidated Plan

- Appropriate documentation depends on characteristics identified in Recipient's Approved Consolidated Plan
- Policies and procedures must establish documentation requirements in line with HUD's required order

117



 


 **At Risk Category 2: Unaccompanied Homeless Children & Youth**

Defined under another Federal Statute

- Third Party – Written verification
 - Must be from agency administering applicable Federal program
 - If certification does not specify age, then documentation of age must be obtained by the recipient/subrecipient

118



 


 **At Risk Category 2: Homeless Children & Youth**

Defined under another Federal Statute

- Applicable Federal Statutes & websites
 - Runaway and Homeless Youth Act: <http://www2.ncfy.com/locate/index.htm>
 - Head Start Act: <http://eclkc.ohs.acf.hhs.gov/hslc/HeadStartOffices>
 - Violence Against Women Act of 1994: <http://www.ovw.usdoj.gov/>

119



 


 **At Risk Category 2: Homeless Children & Youth**

Defined under another Federal Statute

- Applicable Federal Statutes & websites continued
 - Public Health Service Act: <http://bphc.hrsa.gov/index.html>
 - Food and Nutrition Act of 2008: <http://www.fns.usda.gov/snap/>
 - Child Nutrition Act of 1966 –local school dept.

120



 


 **At Risk Category 3: Homeless Children & Youth including Families/ Guardians**

Defined under § 725(2) of McKinney-Vento



- U.S. Dept. of Education (ED) Administers Section 725 (2) of the McKinney -Vento Act.
- Third Party – Written
 - From local school board charged by US ED to work with Homeless Children and Youth.
 - If certification does not specify age, then documentation of age must be obtained by the recipient/subrecipient.


121





Income Recordkeeping Requirements and Examples of Acceptable Documentation


 

 **ESG and Income Requirements**



- At Risk Category 1:
 - Must be below 30% area medium income
- ESG HP Programs:
 - Initial determination (below 30% AMI)
 - Every three months (at or below 30% AMI)
- ESG RRH Programs
 - No income limit at initial
 - Annual Recertification (at or below 30% AMI)


123

 **Obtaining Income Limits**



- www.huduser.org/portal/datasets/il.html
- Use current data
- Look at chart for Extremely Low Income (30% AMI)
- Listed by Geographic area and household size


 

 **Examples of Acceptable Documentation**

- Acceptable documentation for income limited to:
 - Third Party – Source
 - Third Party – Written
 - Third Party – Oral
 - Self-Certification
- **Intake Observation is not applicable**

125



 


 **Income Self-Certification**

Individual/Head of Household Statement

- Written statement certified (signed and dated) as true and complete
- Representative of current income
- Usually used for household's:
 - With no income
 - Who are self-employed
 - Who earn tips



126


 

 **Income Inclusions**

- 1) Earned Income
- 2) Self-Employment/Business Income
- 3) Interest and Dividend Income
- 4) Pension/Retirement Income
- 5) Armed Forces Income
- 6) Unemployment and Disability Income,
- 7) Public Assistance, including TANF
- 8) Alimony and Child Support



127


 

 **Income Exclusions**

- 1) Earned income of children under the age of 18;
- 2) Earnings in excess of \$480 for each full time student 18 years old or older (excludes head of household/spouse);
- 3) Deferred periodic payments of SSI and Social Security
- 4) Lump-sum additions to family assets (e.g. gifts)
- 5) Income of a live-in aide (Sec. 813.102);
- 6) Student assistance paid directly to the student or to the educational institution;



128


 

 **Examples of Acceptable Documentation**

- 1) Earned Income (Wages and Salary)
 - Payment statement
 - Statement of income from employer/source of income
- 2) Self-Employment/Business Income
 - Most recent Financial Statement

129

 **Examples of Acceptable Documentation**



3) Interest and Dividend Income


- Most recent interest or dividend income statement

4) Pension/Retirement Income

- Most recent benefit notice, pension statement or other payment statement from pension provider

130

 **Examples of Acceptable Documentation**



5) Armed Forces Income


- Payment statement
- Statement of income from government official/agency

6) Unemployment and Disability Income

- Most recent benefit or disability income notice from SSI
- Statement from SSI

131

 **Examples of Acceptable Documentation**



7) Public Assistance, including TANF


- Most recent benefit or income notice from public assistance administrator
- Statement from public assistance administrator

8) Alimony and Child Support

- Court Order
- Most recent payment statement

132



 


 **Examples of Acceptable Documentation**

9) No Income Reported



- Self-certification


133

 **Case Scenario**

134



 


 **Janelle and her 2 children**

Recall that Janelle (21) and her children rely on TANF (15% AMI). She was been spending 70% of their income on rent when the landlord raised her rent. Janelle could not pay the increase so the family moved into her brother's place.

Intake staff are using At-Risk Category 1, Risk Factor 2: Living in the Home of Another Due to Economic Hardship



135


 

 **Quiz: Janelle and her 2 children**

What documentation is need for Janelle to receive homelessness prevention assistance?

136

 **Additional Practice Case Scenarios**

(refer to worksheet)

